



The Law Office of Kevin J. Keating, P.C.  
666 Old Country Road, Suite 900  
Garden City, NY 11530  
516-222-1099 • 212-964-2702  
kevin@kevinkeatinglaw.com  
Garden City • Manhattan

August 28, 2024

**Via ECF**

Hon. Joseph F. Bianco  
United States Court of Appeals for the Second Circuit  
Thurgood Marshall United States Courthouse  
40 Centre Street  
New York, New York 10007

**Re: United States of America v. Michael Ashley  
11 CR 0516 (JFB)**

Dear Judge Bianco:

As Your Honor recalls, I represent Michael Ashley, who was sentenced by the Court on July 17, 2019, to a term of imprisonment of 36 months, to be followed by a five year term of supervision. The Court may recall that the custodial portion of Ashley's sentence was subsequently commuted by the President.

I write to respectfully request permission for Ashley to travel on a Caribbean cruise. Mr. Ashley is in his 47 month of supervision and was recently transferred to the low intensity unit of probation supervision. Throughout, he has been fully compliant with all terms of his supervision. Additionally, some time ago the Court granted Mr. Ashley a travel modification during his term of supervision which allows him to travel regularly throughout the United States in connection with his employment.

Mr. Ashley will soon turn 60, and his wife and adult children have planned a cruise for him to celebrate his birthday. It is a Caribbean cruise leaving Miami, Florida on December 14, 2024, and returning December 21, 2024. I note that the cruise is a "closed loop" cruise, so it does not require a passport.

I have conferred with AUSA Bradley King and supervising Probation Officer Lisa Famularo, who have no objection to this application.

Hon. Joseph F. Bianco

August 28, 2024

Page 2

Thank you for your consideration.

Very truly yours,

/s/ *Kevin J. Keating*

KEVIN J. KEATING

KJK/dg

cc: AUSA Bradley King  
P.O. Lisa Famularo